

Exhibit I

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF VERONICA O. LI

I, Veronica O. Li, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present on the subway platform of Cortlandt Street–World Trade Center, which was connected to the lobby of Two World Trade Center, when the terrorist attacks of Tower One occurred. I was present on or near the corner of Church Street and Vessey Street when the terrorist attacks of Tower Two occurred.

4. At that time, I was employed as a Claims Supervisor at Frenkel & Co., Inc., which was located on the 36th Floor of Tower Two. I was on my way to work at Tower Two when the first plane hit Tower One.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I fell and was trampled, which caused a tear in the meniscus of my left knee, a lumbar sprain, left hip pain, and right knee pain. I sustained bruises to my face, back, and both knees, as well as abrasions to both of my eyes. Finally, I have suffered from post-traumatic stress disorder as a result of the events of that day.

7. On September 11th, I was standing on the subway platform at Cortland Street-World Trade Center when the plane hit Tower One. I got off the subway and started up the staircase to the concourse level. I looked up and noticed that people were jumping the turnstiles and running into the subway. I thought there might be something wrong, as I saw many people in business suits running in a panic, but the people I asked weren't able to give me a clear answer. Someone said "it's a bomb," another said "it's a fire," and a third "I heard someone was shooting people." Rather than heading to the concourse and into Tower Two, I headed back into the subway, but we were soon asked to exit. Trying to exit the subway was chaotic; everyone was panicked and desperately wanted out. I eventually exited the subway at the far end of Church Street and Vessey Street, directly below Tower One.

When I looked up at Tower One, I noticed that the building was smoking, and there was a massive hole in the side of the building. I saw and heard several people jumping or falling from Tower One. It was unbelievably catastrophic, and I couldn't move. I saw one woman with long

hair struggling to hold onto the skeleton of the building. I think she was trying to get from one floor to the next and she was having a hard time. Her foot slipped and, as she tumbled down, she struck the building at least twice before hitting the ground. I heard someone screaming and I realized it was me. I saw a lean man wearing blue pants and a navy short sleeved shirt with brown shoes and a brown belt. When he jumped, he got distance. He also had form. His arms were perpendicular to the ground, folded at 90 degree angles, and his legs were slightly parted with his knees bent. As each body landed out of my sight, the thud could be felt in my heart, and I was screaming.

Then I heard an angry, constant, and deafening roar. I looked up and I watched United Airlines Flight 175 hit Tower Two. The impact was immense and it was like time slowed down. The sound, the heat, the fire were all sudden and beyond what you can imagine. As it soared overhead, the scream of the plane was so loud, and I could feel the vibration in my bones. The sudden wave of burning heat felt like I was pushed over by an invisible molten lava sledge hammer. The blinding orange and red fire looked as if the gates of hell have opened above. It was like the devil opened up the sky and screamed at me. The ball of fire and metal flew at us and knocked me down. I later learned that the engine from United Airlines Flight 175 was found not far from where I stood that day.

I struggled to get up and run, but I fell down a second time. When I fell a third time, I was trapped. I felt the ripping sensation in my knee and pain ran up to my hip and back. When I looked down, I realized I was caught in a pile of bodies. There was a man below me who had my ankle in the crook of his elbow and a man below him with wild eyes. Above all of us, was another man half bent over our pile in obvious pain as a mob of people tried to escape over us.

All I could do was curl into a ball and protect my head. I remember saying “don’t break my legs, I need them to run.”

After what seemed like an eternity, I was finally able to get up and I realized that all of my belongings were several feet away from me. I attempted to collect my things, but someone around me grabbed me to pull me underneath the scaffolding and yell at me. When I looked up, I realized why. There was carnage and debris falling from the sky. I looked around me and saw an unresponsive woman lying in a pool of blood on the ground; both of her legs were snapped in half and she was deceased.

As I walked toward City Hall Park, I saw firemen frantically heading to the towers and using any means necessary to get there. It was utterly chaotic and apocalyptic. I walked toward Penn Station, and I was on 14th Street when Tower One collapsed. I saw the smoke and noticed that the antenna usually perched on top of the building was missing from the city’s skyline. At one point, I stopped in a McDonalds and I had to remove my contacts because my eyes were in so much pain. I ultimately took a ferry to a co-worker’s home in Weehawken, though I lived in Queens at the time.

Because of the events of September 11th, I am very bothered by loud noises and the sound of an airplane. As a result, I have trouble staying asleep and am easily awoken by the slightest noise. Additionally, I cannot handle watching movies that depict explosions, plane crashes, and other loud, chaotic, or horrific events. I am constantly aware of the location of fire exits in the event of an emergency. While I was able to visit to the World Trade Center memorial, I had to skip parts of it because I find it very upsetting. It hit me very hard, and it immediately brought me back to the horrible loud and undeniable sound of an airplane crashing into my building that day.


8. I sought medical attention for my injuries. I initially sought treatment on September 13, 2001. I later underwent surgery to repair my left knee and three years of physical therapy. Despite these treatments, I continue to have pain in my knee and I was deemed partially, permanently disabled. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I did not previously pursue a claim through the September 11th Victim Compensation Fund related to my physical injuries incurred on September 11, 2001.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 4 day of January 2020.



Signature of Declarant, Veronica O. Li

Exhibits Filed Under Seal